

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO MOTION OF UPS FOR EXTENSION
OF TIME TO RESPOND TO QUESTION 1 OF POIR NO. 19
(August 18, 2000)

The United States Postal Service hereby responds to the motion of UPS, filed August 16, to extend until August 25th the time to respond to Question 1 of POIR No. 19. In Ruling No. R2000-1/125, issued yesterday, the Presiding Officer deferred his ruling on this motion, and established today as the deadline for responses.

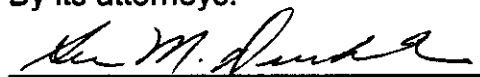
The Postal Service believes that this matter has evolved since UPS filed its motion, and that the Postal Service, UPS, and other interested parties are actually in consensus on how it should be resolved. Although perhaps not explicitly stated as such in the UPS motion, the primary intent appears to have been to "have Dr. Neels' responses [to NOI No. 4 and to Question 1 of POIR No. 19] be contained in a single filing." UPS Motion at 1. Based on that portion of the motion, and prior informal consultation with UPS counsel, it is the Postal Service's understanding that, since the Presiding Officer's Ruling No. R2000-1/124 (August 17, 2000) has now established August 21 as the date for filing of NOI No. 4 responses, UPS is prepared to file its responses to both NOI No. 4 and Question 1 of POIR No. 19 on Monday, August 21st. That result is acceptable to the Postal Service, and the Postal Service has been authorized by UPS counsel, MPA counsel, and OCA counsel to represent that it is acceptable to all of them as well. Therefore, the Postal Service submits that the

requested delay with respect to the response to Question 1 of POIR No. 19 need only be extended until August 21st, the same date scheduled for responses to NOI No. 4.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:




Susan M. Duchek



Eric P. Koetting

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.



Eric P. Koetting

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